

Larry Greene
Air Pollution Control Officer
Yolo-Solano Air Quality Management District
1947 Galileo Ct., Suite 103
Davis, CA 95616

Re: October 16, 1997 Draft Title V Permit - Woodland Biomass Power Ltd.

Dear Mr. Greene:

We received the revised versions of the Title V proposed permit for Woodland Biomass Power Ltd. dated 10/16/97 and 12/8/97. Thank you for addressing our comments. The permit now adequately addresses the major and minor concerns we raised in our initial comment letter of July 23, 1997 and our recent concern regarding applicability of Federal and District regulations to insignificant emission units per our December 8, 1997 FAX. In addition the revised format significantly improves the permit.

We have some minor comments which need to be addressed prior to issuance of the permit. In reviewing the revised proposed permit we noticed that in numerous parts reference was made to the condition numbers in the previous version. In addition, there were some erroneous reference citations. We suggest that you verify and correct these citation and references. The errors we found are listed below.

Page 1

- change footnote citation 40 CFR 5220 to 40 CFR 52.20.
- please note: requirements for non-road engines are not applicable under Title V

Page 2

- footnote 1 refers to Process Safety Management; it should refer to Chemical Accident Prevention Provisions.
- 122 r should be corrected to 112 (r).

Page 7

- condition N.4 needs rewriting.
- condition N.4 refers to condition 17e which is a reference to the previous proposed permit

Page 8

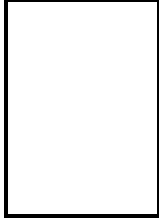
- condition A.1.e refers to condition 20 which is not in this permit.
- condition B.2 refers to condition 18g which is not in this permit.

Page 10

- condition B.1 and B.1.b should refer to tests methods in 40 CFR 51 and 40 CFR 60 not 40 CFR 52 and 40 CFR 60.

Page 15

- the measurement unit for lime is missing in Table 5



Page 15

- the measurement unit for lime is missing in Table 5

Page 18

- delete "1" after test in line 4 of condition A.1.d.
- correct the numbering sequence after condition B.3.d.

Page 20

- the term "over" used in the condition C.5 requirement is not clear.

The District may issue the final permit after the corrections are made. Please note that if the permit is later found to require corrective steps (including, but not limited to, reopening the permit for cause) the expiration of both EPA's review period and the public petition period does not compromise the Agency's authority to take such measures.

We appreciate your attention to our comments. If you have any questions please call Kathy Diehl of my staff at (415) 744-1232.

Sincerely,

Matt Haber
Chief, Permits Office

cc: D. Randall Bates, Woodland Biomass Power Ltd.
Ray Menebroker, ARB

DATE: 12/8/97

TO: Steve Speckert
Yolo-Solano AQMD

FAX: 530 757-3670

cc: Tom Hadden
Hadden Environmental

FAX: 530 647-9254

FROM: Kathy Diehl
U.S. EPA

PHONE: 415 744-1232

SUBJECT: Woodland Biomass Permit

MESSAGE: The revised permit format significantly improves the permit. We have one major and several minor comments. We would like to address the major comment in this FAX so we can resolve our concerns prior to sending our formal comments. Our major comment is related to the insignificant emission units listed in the table on page 1 of the permit. The current language on page 1 in conditions I. A. 1 and I. A. 2 regarding these units erroneously indicates they are all exempt from all District and Federal regulations because they are exempt from the District's Permit System Regulation III. We suggest the following changes to the permit to correct this language:

Changes to Language

1. Delete the first sentence in I. A. 1
2. Delete the second sentence in I. A. 2

Please contact me so we may discuss these changes. If you agree to them we will reference our agreement in our formal comment letter to you. My phone number is 415 744-1232.